

EXHIBIT Q

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to: <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN) ECF Case

DECLARATION OF CHRISTOPHER L. YOUNG

I, Christopher L. Young, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based on my personal knowledge unless otherwise indicated.

2. I was a citizen of the United States on September 11, 2001, and remain so today. Attached herein as Exhibit A to this Declaration is a true and correct copy of my proof of citizenship.

3. On September 11, 2001, I was present in New York City when the terrorist attacks of the World Trade Center (WTC) Towers occurred. At the time of these horrific attacks, I worked for the New York Police Department (NYPD) Traffic Division.

4. On the morning of 9/11, I had been patrolling in my squad vehicle at Trinity and Liberty Streets. After the first passenger jet collided with the North Tower, I immediately travelled in my squad car to the WTC area. As I drew closer to the WTC, I saw a massive amount of smoke coming from the North Tower. The NYPD Command Center then contacted me and dispatched me to the area to help assist in evacuating people from the World Trade Center Towers and with traffic control duties.

5. As I arrived near the World Trade Center area and I walked on foot to the concourse area of the North Tower, I heard an incredibly loud explosion and the ground under my feet began to shake. I watched in horror as the second passenger jet, United Airlines Flight 175, slammed into the upper section of the South Tower (Tower Two).

6. People around me were screaming, crying for help, and rushing as quickly as possible to escape the falling debris and the chaos that surrounded the area. I witnessed horrific scenes of people jumping from each of the Towers and plunging to their deaths. Some of these victims landed within close proximity to my position as I continued to assist the injured and those fleeing the carnage. The scene was like a war zone.

7. Despite the chaos around me, I performed my duties by helping people in the area to various store entrances so that they could take shelter from the falling debris. I was still in the area near the base of the North Tower assisting survivors of the initial attacks when the South Tower collapsed. I became engulfed in a thick cloud of smoke, chemicals, and building debris. I inhaled large quantities of these substances into my lungs and airways, and my eyes began to burn from the exposure to these harmful substances in the air.

8. As I continued to try to help survivors to escape the area, I heard a second horrible rumble and I watched in disbelief as the North Tower began to collapse. As the building collapsed, a large piece of building debris from the collapsing North Tower struck me and I slammed into the concrete from the force of the impact. The impact of the blow from the falling debris caused me to injure my leg. I also received small cuts around my eyes from the falling debris.

9. As I lay on the concrete in agony, I felt the hands of a fellow police officer lift me to my feet. He then helped me to limp out of the immediate area of the debris field and into an

ambulance. The EMS personnel then transported me to Beth Israel Hospital where I received initial treatment for my 9/11 injuries.

10. As a result of these terrorist attacks, I suffered the following specific physical injuries on September 11, 2001: asthma¹, shortness of breath², GERD³, bronchitis⁴, lacerations and irritation to both of my eyes⁵, a leg injury⁶, and peripheral neuropathy⁷. Attached herein as Exhibit B to this Declaration is a true and correct copy of my select relevant medical records related to my 9/11 injuries, which includes a true and correct copy of my December 2, 2016, letter from the World Trade Center Health Program in which they certified my 9/11-related asthma injury.

11. I further suffered, and continue to suffer, severe emotional distress as a result of these terrorist attacks. I suffered and continue to suffer from anxiety and bouts of depression due to these traumatic events on a daily basis. I have been diagnosed with a major depressive disorder with recurrence⁸, post-traumatic stress disorder⁹, an anxiety disorder¹⁰, and a panic disorder¹¹. The horrific events that I witnessed on 9/11 directly caused all of the above conditions, which continue to this day.

I DECLARE, VERIFY AND STATE UNDER PENALTY OF PERJURY that the foregoing is true and correct.

¹ See Medical Records of Christopher L. Young (YOUNG_MEDS_000001), attached hereto as Exhibit B at 0001, 0016.

² *Id.* at 0016-0018.

³ *Id.* at 0023.

⁴ *Id.* at 0018.

⁵ *Id.* at 0014.

⁶ *Id.* at 0004, 0014.

⁷ *Id.* at 0019.

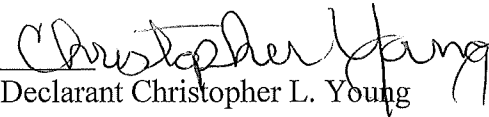
⁸ *Id.* at 0013.

⁹ *Id.* at 0013-0014.

¹⁰ *Id.* at 0013.

¹¹ *Id.* at 0013.

DATED this 8 day of December 2021.


Declarant Christopher L. Young

**EXHIBITS
FILED
UNDER SEAL
(ECF No.
5716)**